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Of Attorneys for Defendants
5 Alireza Zamanizadeh, a/k/a Ali
Zamani and Adult Care Search
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF OREGON**
10 **PORTLAND DIVISION**

11 **ANGELA TORRES, an individual,**

12 **Plaintiff,**

13 **v.**

14 **ALIREZA ZAMANIZADEH, a/k/a ALI**
15 **ZAMANI, an individual, and ADULT**
CARE SEARCH, a foreign non-profit
corporation,

16 **Defendants.**

Case No. 3:17-cv-01270-AC

NOTICE OF MOTION TO
WITHDRAWAL PER LR 83-11(a)

17 PLEASE TAKE NOTICE that as of February 1, 2018, pursuant to LR 83-11(a),
18 Timothy J. Calderbank and Landerholm, P.S. are hereby withdrawing as counsel of
19 record for defendants effective immediately. This Motion is supported by the facts set
20 forth below, the Declaration of Timothy J. Calderbank, and the record in this matter.

21 **I. MOTION**

22 Pursuant to LR 83-11(a), Landerholm, P.S. and Timothy J. Calderbank are
23 withdrawing from their representation of Defendants for the following reasons:

- 24 1. Court preliminarily ordered all assets and monies frozen from the bank
25 accounts of Defendants;
26

2. Only court authorized payments, including legal fees, can be made with no guarantee our firm would ever be paid;
3. Attorney has lost faith in clients' ability to cooperate meaningfully;
4. Attorney may become a fact witness in this or subsequent proceedings;
5. Client refusing to following attorney's advice;
6. The attorney has a conflict of interest or cannot otherwise continue representing defendants without violating the rules of professional conduct.

Mr. Calderbank requests that he be removed from the case docket and the Notice of Electronic Filing as indicated on the docket as of the filing date of this Notice of Withdrawal.

DATED this 25th day of January, 2018.

LANDERHOLM, P.S.

/s/ Timothy J. Calderbank
TIMOTHY J. CALDERBANK, OSB #45682
Of Attorneys for Defendants

1 **CERTIFICATE OF SERVICE**

2 I certify that I electronically filed the foregoing **NOTICE OF MOTION TO**
3 **WITHDRAWAL PER LR 83-11(a)** with the Clerk of the Court for the United States
4 District Court, District of Oregon, by using the CM/ECF system on 25th day of January,
5 2018, namely to:

6 David W. Richardson
7 PDX Law Group, P.C.
8 121 SW Morrison St, Suite 1520
9 Portland, OR 97204

10 **VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED**

11 Alireza Zamanizadeh
12 Adult Care Search, Inc.
13 613 SW Elderbrook Place
14 Portland, OR 97225

15 Signed at Vancouver, Washington this 25th day of January, 2018.

16 /s/ Timothy J. Calderbank
17 TIMOTHY J. CALDERBANK, OSB #45682